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Attorneys for Defendant FORD MOTOR COMPANY

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
(SAN FRANCISCO DIVISION)

EAST BAY LAW,

Plaintiff,

vs.

FORD MOTOR COMPANY,

Defendant.

Case No. 15-cv-04257-TEH

**STIPULATED REQUEST TO  
CONTINUE CASE MANAGEMENT  
CONFERENCE; ~~PROPOSED~~  
ORDER**

Complaint Filed: July 23, 2015

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**STIPULATION AND REQUEST**

Plaintiff East Bay Law (“Plaintiff”) and Defendant Ford Motor Company (“Defendant”) (collectively referred to as the “Parties”) through their respective counsel hereby stipulate as follows:

WHEREAS, a Case Management Conference is currently scheduled for February 22, 2016;

WHEREAS, based on the Case Management Conference date, the current deadline to conduct a Rule 26(f) conference is February 1, 2016 and the deadline for the Parties to exchange Initial Disclosures and file a Joint Case Management Statement is currently February 12, 2016;

WHEREAS, on January 13, 2016, Defendant filed a Motion to Dismiss Amended Complaint (Dkt. No. 43) which is currently scheduled to be heard on February 22, 2016; and

WHEREAS, the Parties agree that in the interest of maximizing case efficiency, the deadlines for the 26(f) conference, Initial Disclosures and Joint Case Management Statement should follow after the February 22, 2016 hearing on Defendant’s Motion to Dismiss;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND REQUESTED by and between the Parties, through their respective attorneys of record, that the Case Management Conference be continued to March 21, 2016 at 1:30 p.m., which would also extend the Parties’ deadline to conduct a Rule 26(f) conference to February 29, 2016 and the Parties’ deadline to exchange Initial Disclosures and file a Joint Case Management Statement to March 14, 2016.

DATED: January 22, 2016

LAFAYETTE & KUMAGAI LLP

By: /s/ Brian H. Chun

BRIAN H. CHUN

Attorneys for Defendant  
FORD MOTOR COMPANY

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1 DATED: January 22, 2016

EAST BAY LAW

2  
3 By: /s/ Andrew W. Shalaby  
4 ANDREW W. SHALABY

5 Attorneys for Plaintiff  
6 EAST BAY LAW

7 **SIGNATURE ATTESTATION**

8 I hereby attest that I have obtained the consent of Andrew W. Shalaby, counsel for  
9 Plaintiff, for the filing of this Stipulation.

10  
11 /s/ Brian H. Chun  
12 BRIAN H. CHUN

13 **ORDER**

14 For good cause appearing therefor, and pursuant to the parties' stipulation, it is hereby  
15 ORDERED that the Case Management Conference be **CONTINUED** to **March 21, 2016 at**  
16 **1:30 p.m.**

17 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

18  
19 DATED: 01/25, 2016

20   
21 THELTON E. HENDERSON  
22 United States Senior District Judge  
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